

Serial No. 09/664,479

Art Unit No. 2618

REMARKS

Claims 1-2, 9-15 were pending in the patent application. The Examiner has newly rejected Claims 1-2 and 9-15 under 35 USC 102 as anticipated by the Tate patent. Applicant first notes that the Office Action states that the claims are rejected as anticipated by Tate; however, the narrative explaining the rejections cite the Saegusa patent. Applicant requests clarification of the rejections in the form of a non-final action addressing this response. For the reasons set forth below, Applicant believes that the invention is patentable over the cited art and respectfully requests reconsideration of the rejection.

The present application teaches and claims a network node device for automatically, dynamically, and selectively connecting one or more telephone wirelines to one or more wireless connections, with the aim of providing dynamic selective bridging of both incoming and outgoing calls to and from wireless devices based on unique identifying information, including privacy policies associated with the wireless devices to which the wireless connections are being made. The invention comprises steps and means for

Y0R920000632

-13-

Serial No. 09/664,479

Art Unit No. 2618

performing the steps, by a network node comprising one or more connections to one or more telephone wirelines; one or more wireless signal generators supporting one or more wireless connections; at least one storage location for storing unique service information for each of a plurality of wireless devices; a processor for accessing the storage location and for generating call processing signals based on the stored unique information; an interconnection switch that makes and breaks one or more interconnections between the telephone wirelines and the respective wireless signal generators to connect multiple incoming calls to more than one of the plurality of wireless devices in response to the call processing signals; and a bridge that dynamically bridges signals from multiple wireless connections to more than one of the telephone wirelines for outgoing calls from one or more of the wireless devices in response to call processing signals generated by the processor based on stored unique information (Claims 1 and 14). The network node device may further include a verifier that verifies the validity of a request from a wireless device through a wireless connection for the bridging of signals (Claim 2), and may further be adapted to dynamically and selectively

YOR920000632

-14-

Serial No. 09/664,479
Art Unit No. 2618

connect signals from wireless devices based on both unique identifier and unique service information (Claims 9 and 10), and the device may be adapted to alter the connection of signals dynamically, during use after a wireless connection has already been made (Claims 11, 13 and 15) or may deny bridging (Claim 12).

Under the present invention, while multiple devices may share a telephone number, and the associated single wireline, the inventive network node and method allows selective connection across the different devices based on the unique information associated with each specific device, such that multiple incoming calls to a single telephone number and/or outgoing calls can be connected between multiple different wireless devices and the wirelines even when the wireless devices share the same telephone number. As expressly taught in the Specification, at page 30, lines 16-19, received digits are the telephone number which the telephone switch desires to connect, and the destination may change from call to call. Applicant respectfully asserts that neither the Saegusa patent nor the Tate patent teaches the invention as claimed.

YOR920000632

-15-

Serial No. 09/664,479

Art Unit No. 2618

Since the Office Action references the Saegusa patent in the sub-paragraphs in section 3 of the Office Action, Applicant reiterates the following arguments with respect to the teachings of the Saegusa patent. The Saegusa patent is directed to a cordless key telephone system for a multiple tenant facility. Under the teachings of the Saegusa patent, different tenants, for example in a large office building, can share the same telephone system. "In response to an incoming call, a ringing signal is broadcast containing the identification of the line at which the incoming call is terminated. Each of the cordless stations comprises a plurality of line keys associated respectively with the exchange lines and a plurality of line indicators associated respectively with the line keys, and a memory for storing tenant data indicating ones of the exchange lines to which the cordless station is authorized to access" (Col. 1, lines 54-62). Applicant again notes that the Saegusa system includes a main unit, which includes "interface units 11 to which exchange lines 5-1 through 5-n of different tenants are terminated" (Col. 2, lines 59-61). The exchange lines of different tenants are different wirelines associated with different telephone numbers. As further taught in Col. 3,

YOR920000632

-16-

Serial No. 09/664,479

Art Unit No. 2618

lines 15-24, line indicators at the cordless stations "indicate...arrival of a call to the associated exchange line". As such, Saegusa is not teaching or suggesting a network node or method for connecting multiple incoming calls to a single called telephone number to more than one of a plurality of wireless devices sharing that one number.

Moreover, under Saegusa, it is the tenant memory at the cordless station (37 of station 3 in Fig. 1) which stores the information about which exchange lines can be accessed by the cordless station (see: Col. 3, lines 39-46). Clearly, therefore, Saegusa does not anticipate the claimed network node having at least one storage location for storing unique information specific to each of a plurality of wireless devices. While the claimed invention provides the storage location and the processor capability for accessing and exploiting the stored information at the network node, Saegusa teaches that its tenant memory is at the cordless station. The Examiner has cited the passage from Col. 1, lines 14-16 against the network node storage location. However, Applicant notes that the cited passage details a prior art system having three components, the network node, a central unit with tenant memory at the

YOR920000632

-17-

Serial No. 09/664,479

Art Unit No. 2618

receiving facility, and the telephone sets. A central unit at the receiving facility is not the same as or suggestive of the claimed network node. Applicant further notes that the cited passage goes on to discredit the prior art system as unworkable and "prohibitively long" (Col. 1, lines 32-40); so, one would clearly not be motivated to modify Saegusa with the prior art components.

With regard to the claimed processor of the network node, the Examiner has cited the control 14 at the main unit. Saegusa does not teach or suggest that the control at the main unit accesses a storage location and generates call processing signals based on stored unique information. Rather, the main unit of Saegusa broadcasts alert signals on its control channel and waits for the control units on the cordless stations to handle any storage lookups, authorizations, and connection to the alert signals.

With regard to the claimed interconnection switch, the Examiner cites teachings from Col. 13 and Col. 19. Applicant notes, however, that the Saegusa patent only has 10 columns of content. Clearly Applicant cannot address this ground for rejection. Applicant requests clarification of the rejection, in the form of a non-final action.

YOR920000632

-18-

Serial No. 09/664,479

Art Unit No. 2618

It is well established under U.S. Patent Law that, for a reference to anticipate claim language under 35 USC 102, that reference must teach each and every claim feature. Anticipation under 35 USC 102 is established only when a single prior art reference discloses each and every element of a claimed invention. See: In re Schreiber, 128 F. 3d 1473, 1477, 44 USPQ2d 1429, 1431 (Fed. Cir. 1997); In re Paulsen, 30 F. 3d 1475, 1478-1479, 31 USPQ2d 1671, 1673 (Fed. Cir. 1994); In re Spada, 911 F. 2d 705, 708, 15 USPQ2d 1655, 1657 (Fed. Cir. 1990) and RCA Corp. v. Applied Digital Data Sys., Inc., 730 F. 2d 1440, 1444, 221 USPQ 385, 388 (Fed. Cir. 1984). Since the Saegusa patent does not teach a network node device for dynamically, and selectively connecting one or more telephone wirelines to one or more wireless connections comprising: one or more connections to one or more telephone wirelines; one or more wireless signal generators supporting one or more wireless connections; at least one storage location for storing unique service information for each of a plurality of wireless devices; a processor for accessing the storage location and for generating call processing signals based on the stored unique information; an interconnection switch that makes and

YOR920000632

-19-

Serial No. 09/664,479

Art Unit No. 2618

breaks interconnections between the telephone wirelines and the respective wireless signal generators to connect one or multiple incoming calls to more than one of the plurality of wireless devices in response to the call processing signals; and a bridge that dynamically bridges signals from multiple wireless connections to one or more of the telephone wirelines for outgoing calls from more than one of the wireless devices in response to call processing signals generated by the processor based on stored unique information, it cannot be maintained that the Saegusa patent anticipates the invention as claimed. Accordingly, Applicant believes that the anticipation rejections must be withdrawn.

Applicant has also considered the teachings of the Tate patent which is directed to an interconnection control method in a cordless telephone system having a connection unit connected to a subscriber line and a plurality of radio telephone sets connected through a radio communication circuit to the connection unit. Under Tate, each of the radio telephone sets in a signal transmits a calling signal containing group identification code and individual identification information. The connection unit returns an

YOR920000632

-20-

Serial No. 09/664,479

Art Unit No. 2618

answer calling signal when the received group identification code coincides with predetermined information and establishes a speech channel between the connection unit and the other party telephone set.

Applicant asserts that the Examiner has erred in interpreting the claim language. With regard to the steps and means for storing unique service information, the Examiner states that "group identification codes" corresponds to "unique service information". Applicant respectfully disagrees. The term "unique" indicates that service information in accordance with the present invention is "specific to each of the plurality of wireless devices". The unique service information does not refer to service available to a group of devices; but refers to service information that is associated with only one device. Further, Tate teaches that a group identification code identifies all the radio telephone sets to be connected with the connection unit. Clearly identification of "all sets" does not anticipate unique service information.

With respect to the steps and processor for accessing the storage location and for generating call processing signals based on the stored unique information, Applicant

Serial No. 09/664,479

Art Unit No. 2618

again disagrees with the Examiner's conclusion that group identification codes comprise unique service information. Further, Tate generates signals if group information shows that all sets in the group should have service, while the present invention only generates call processing signals for one set based on unique service information. Applicant further asserts that "14 of Fig. 1" is cited against the processor as well as the bridge. One component of the reference cannot anticipate two distinctly claimed components set forth the claims.

In addition, Applicant contends that the Tate patent does not teach or suggest an interconnection switch as claimed. While Tate may connect one set from a group to a call, Tate does not teach or suggest connecting multiple incoming calls for the same single called telephone number to more than one wireless device.

Applicant reiterates that anticipation under 35 USC 102 is established only when a single prior art reference discloses each and every element of a claimed invention. (Ibid.). Since Tate does not teach or suggest all of the claim features, it cannot be maintained that the claimed invention is anticipated.

YOR920000632

-22-

**Serial No. 09/664,479
Art Unit No. 2618**

Based on the foregoing remarks, Applicant respectfully requests reconsideration of the claim language, withdrawal of the rejections, and allowance of the claims.

Respectfully submitted,
R. E. Chapman

By: *Anne Vachon Dougherty*
Anne Vachon Dougherty
Registration No. 30,374
Tel. (914) 962-5910